

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE

Case No. 23-21916-JCM

Marvin Arturo Galeas and
Amber Anne Galeas,
Debtors,

Chapter 13

Marvin Arturo Galeas and
Amber Anne Galeas,
Movants,

- vs. -

Access Receivables Management,
America First Finance, B&L Wholesale
Supply, Inc, Caine & Weiner, Capital
One by American InfoSource, CFG
Merchant Capital, JPMorgan Chase Bank,
Creit Collection Services, Discover Bank,
Forward Financing, LLC, Liberty Roofing
Centers, Midland Credit Management, Inc
US Department of Education, NELNET,
SRS Distribution, Xerox Corp, Pennsylvania
Department of Revenue, UPMC Health Services,
UPMC Physician Services, Duquesne Light
Company, and Ronda J. Winnecour,
Chapter 13 Trustee,
Respondents.

NOTICE OF PROPOSED MODIFICATION TO
PLAN DATED October 17, 2023

1. Pursuant to 11 U.S.C. § 1329, the Debtor(s) has filed an Amended Chapter 13 Plan dated January 17, 2024, which is annexed hereto at Exhibit "A" (the "Amended Chapter 13 Plan"). A summary of the modification is set forth below in paragraphs 4 through 6 of this Notice.

2. All Objections to the Amended Chapter 13 Plan must be filed and served by no later than 21 days after the date of this Notice upon the Debtor(s), Chapter 13 Trustee and any creditor whose claim allowance or treatment is the subject of the Objection. Untimely Objections will not be considered. Any creditor who files a timely Objection to the Amended Chapter 13 Plan must appear at the scheduled Initial Confirmation Hearing on the Amended Chapter 13 Plan.

3. A virtual (via Zoom) Initial Confirmation Hearing on the Amended Chapter 13 Plan will be held on February 8, 2024, at 10:00 a.m., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <http://www.ch13pitt.com/calendar/> several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <http://www.ch13pitt.com/> and to comply with the procedures set forth at that site for conference participation.

4. Pursuant to the Amended Chapter 13 Plan, the Debtor(s) seeks to modify the Plan in the following particulars:

The amount to be paid to general unsecured creditors is increased to \$60,000.00. As a result, the dividend to general unsecured creditors has increased to 12.9%.

5. The proposed modification to the Plan will impact the treatment of the claims of the following creditors, and in the following particulars:

The above-named general unsecured creditors will be impacted by the increase in amounts available to pay general unsecured creditors.

6. Debtor(s) submits that the reason(s) for the modification is (are) as follows:

The amount paid to general unsecured creditors increased to \$60,000.00

7. The Debtor(s) submits that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtor(s) further submits that the proposed modification complies with 11 U.S.C. §§ 1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the Debtor(s) respectfully requests that the Court enter an Order confirming the Amended Chapter 13 Plan, and for such other relief the Court deems equitable and just.

RESPECTFULLY SUBMITTED, this January 17, 2024.

**BY: /s/ Andrew K. Pratt
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